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1. Article Addressed to:

Mr. Stephen Wisniewski
Vice President, Operations
Pepco holdings, Inc.
701 Ninth Street, N.W.
Washington, D.C. 200028

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☒ Agent ☐ Addressee
X *Donald H. Monroe*

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REGION III

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3WP42 Hopkins

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

JUN 05 2013

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Stephen Wisniewski
Vice President, Operations
Pepco Holdings, Inc.
701 Ninth Street, NW
Washington, DC 20068

Re: Clean Water Act, Section 308 Request for Information

Dear Mr. Wisniewski,

The enclosed Request for Information is issued this date pursuant to Section 308 of the Clean Water Act, 33 U.S.C. § 1318 and requires, among other things, that Pepco-Benning Generating Station provide information regarding closure of the facility and NPDES discharges associated with NPDES Permit No. DC0000094. The requirement to provide information to the U.S. Environmental Protection Agency is mandatory. You must respond in accordance with the instructions and milestones set forth in the Request for Information.

If you have any questions about this Request for Information, you may contact Ingrid H. Hopkins at (215) 814-5437.

Sincerely,

A handwritten signature in black ink, appearing to read "D. McGugan".

David B. McGugan, Ph.D.
Associate Director
Office of NPDES Permits and Enforcement
Water Protection Division

Enclosure

cc: Collin Burrell, DDOE

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, PA 19103-2029**

In The Matter of:	:	
	:	
	:	Pursuant to Section 308(a) of the
	:	Clean Water Act, 33 U.S.C. § 1318(a)
Potomac Electric Power Company, Inc.	:	
Benning Generating Station	:	
3400 Benning Road, NE	:	
Washington, DC 20019	:	
	:	REQUEST FOR INFORMATION
	:	
Respondent	:	
	:	

I. STATUTORY AUTHORITY

1. This Information Request is issued under the authority vested in the United States Environmental Protection Agency ("EPA") by Section 308 of the Clean Water Act ("CWA"), 33 United States Code ("U.S.C.") § 1318. The Administrator of the EPA has delegated this authority to the Regional Administrator of EPA, Region III, who in turn has delegated it to the Director of the Water Protection Division of EPA, Region III, who in turn has delegated it to the Associate Director of the Office of NPDES Permits and Enforcement. EPA hereby requires the Potomac Electric Power Company, Inc. to provide the information specified below.

II. STATUTORY AND REGULATORY BACKGROUND

2. EPA is authorized under Section 308 of the CWA, 33 U.S.C. § 1318 to require owners and operators of point sources to establish records and make such records, as may be necessary to carry out the purpose of the Act, including, but not limited to:
 - (a) developing or assisting in the development of any effluent limitation or other limitation or prohibition, effluent standard, pretreatment standard or standard of performance under the CWA;

- (b) determining whether any person is in violation of any such effluent limitation or other limitation, prohibition or effluent standard, pretreatment standard or standard of performance;
 - (c) any requirement under Section 308 of the CWA; and
 - (d) carrying out Sections 305, 311, 402, 404 and 504 of the CWA.
3. Failure to respond as directed to a CWA Section 308 request is punishable under the civil and criminal provisions of Section 309 of the CWA, which provide for the assessment of penalties, injunctive relief and imprisonment. Providing misleading or false information may subject you to civil and criminal sanctions. The information you provide may be used by EPA in administrative, civil or criminal proceedings.
 4. You may, if you desire, assert a business confidentiality claim covering all or part of the information requested herein, in the manner described in 40 C.F.R. Part 3, Subsection B. Information covered by such a claim will be disclosed by EPA only to the extent and by means of the procedures set forth in Subpart B, 40 C.F.R. Part 2. If no claim of confidentiality accompanies the information requested herein when it is received by EPA, it may be made available to the public by EPA without further notice. You may not withhold any information from EPA on the grounds that it is confidential business information. This inquiry is not subject to review by the Office of Management and Budget under the Paperwork Reduction Act, 44 U.S.C. Chapter 35 (See 5 C.F.R. Section 1320.2 (c)).

III. INSTRUCTIONS

5. Identify each person responding to any question contained in this Information Request on behalf of the Respondent, as well as each person consulted in the preparation of the response. Include each person's name, professional title, and contact information.
6. If tabulation is requested, provide the requested information in tabular form, in hard copy and also in tabular form, in an electronic spreadsheet file, Excel format.
7. To the extent information requested herein was previously provided to EPA by Pepco Electric Power Company, Inc., Benning Generating Station, there is no need to provide it again, but rather identify the information and the date it was previously provided.
8. If requested information or documents are not known or are not available at the time of your response to this Information Request, but later becomes known or available, the Respondent must supplement its response to EPA. Moreover,

should the Respondent find at any time after submission of its response that any portion is or becomes false, incomplete or misrepresents the facts, the Respondent must provide EPA with a corrected response, as soon as possible.

9. All submissions provided pursuant to this request shall be signed and dated by a responsible official of the Respondent and include the following certification:

"I certify that the information contained in or accompanying this submission is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. I certify as having responsibility for the persons who, acting under my direct instruction, made the verification, that this information is true, accurate and complete."

Signed: _____
Title: _____

10. Submit your response to:

Ingrid H. Hopkins
NPDES Enforcement Branch (3WP42)
Water Protection Division
U.S. Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103-2029

11. If you have questions regarding this Information Request, you may contact Ingrid H. Hopkins, at (215) 814-5437.

IV. DEFINITIONS

12. The terms "document" and "documents" shall mean any format that records, stores or presents information and includes writings, memoranda, records or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, storage device or hard copy, including any form or format of these types. If in computer format or memory, each such document shall be provided in a translated form that is useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include: (a) copy of each document which is not an exact duplicate of a document which is provided; (b) each copy which has any writing, notation, or the like on it; (c) drafts; (d) attachments to or enclosures with any document; and (e) every other document referred to or incorporated into each document.

13. The term "permit" refers to the National Pollutant Discharge Elimination System Industrial Permit No. DC0000094 issued to the Potomac Electric Power Company, Inc., Benning Generating Station, on June 19, 2009.
14. The term "Respondent" refers to the Potomac Electric Power Company, Inc., Benning Generating Station, located at 3400 Benning Road, NE, Washington, DC 20019.
15. The term "identify" with respect to a natural person means to provide the name, professional title, contact information and the relationship to the Respondent.
16. The term "identify" with respect to a business entity means to provide that entity's name, address and relationship to the Respondent and to also provide the name, professional title, contact information of an individual who can provide information related to and on behalf of the entity.

Potomac Electric Power Company, Inc.
Benning Generating Station
DC0000094

V. INFORMATION REQUEST

17. Describe the process that Pepco-Benning has implemented to identify the source(s) or potential source(s) of heavy metals entrained in discharges from the NPDES permitted outfall 013. In your response, include:
 - (a.) the dates that Pepco-Benning first became aware of the heavy metals excursions;
 - (b.) the process used to determine the source(s) or potential source(s) of the heavy metals excursions;
 - (c.) the personnel involved in the decision to adopt this particular process; and
 - (d.) the processes implementation schedule.
18. Provide an outline that describes in detail the activities that Pepco-Benning conducted to minimize the metals excursions at Outfall 013 and throughout the site. Include:
 - (a.) the timeframe for final application and the expected outcomes;
 - (b.) the one-time cost of each BMP applied; and
 - (c.) the maintenance schedule and the costs associated with maintenance of each BMP.
19. Phase I of the TMDL Implementation Plan required Inlet Maintenance. Has Pepco-Benning evaluated the effectiveness of the metal absorbing inlet guards, applied at all the storm drain inlets throughout the facility, except at six (6), where the design would not permit the application of this particular BMP? If so, provide the process used to evaluate the BMPs and any reports or documents developed as a result of the evaluation conducted. If an evaluation has not been completed, provide a date certain for when an evaluation will be conducted and provide the evaluation immediately thereafter.
20. At the six (6) storm drains that could not be outfitted with metal absorbing inlet guards, please describe the BMPs that were applied in response to the TMDL Implementation Plan, if any. Include the maintenance required, the maintenance schedule and associated costs.
21. Phase II of the TMDL Implementation Plan required Metals Management. Under Phase II, Pepco-Benning has either sheltered or removed equipment and materials previously exposed to wet weather. Please explain the effect that the adoption of

the Phase II Metals Management Plan has had on the metals excursions at Outfall 013, to date. If costs were associated with this effort, please provide a cost schedule.

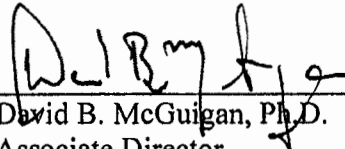
22. As required by NPDES Permit No. DC0000094, issued on June 19, 2009, provide a copy of the approved TMDL Implementation Plan for Pepco-Benning's planned activities toward meeting the required load reductions for the Anacostia River TMDL for metals.
23. Describe any additional measures implemented, resources utilized or plans developed to minimize or eliminate metals excursions at the facility.
24. In July 2012, Pepco-Benning notified EPA, Region 3 that AMEC, Pepco-Benning's consultant and storm water sampling contractor, conducted an initial review of historic metals concentrations. AMEC was also preparing to further investigate the excessively high metals results. Please provide a final analysis of the initial review and the investigation.
25. Provide a facility schematic, identifying the "hotspots" identified and annotate where the BMPs have been implemented at storm drain inlets and across the site, to reduce or eliminate metals excursions.
26. Identify Pepco-Benning's plans for the proposed use(s) for the Pepco-Benning Generating Station after its closure.
27. Provide any final agreements, contracts, memoranda of understanding or similar documents between Pepco-Benning and any other entity, relating to the closure and/or sale, of the Pepco-Benning Generating Station.
28. Identify any and all approvals from any federal, state or local governmental entity which are required for the transfer of ownership and/or decommissioning of the Pepco-Benning Generating Station. Provide any and all documents related to such approvals, the date of submittal of each document and identify the name of the person or entity to which it was submitted.
29. Provide copies of any financial or legal documents which relate to the transfer and/or closure of the facility.
30. Identify and produce copies of permits for the demolition of any structures, process wastewater and stormwater outfalls and associated piping.
31. Identify the manner in which the environment, including surface water, air and groundwater will be protected before during and after any demolition activities.

32. Provide a schedule detailing what structures will be taken out of service, dismantled or otherwise removed from the property; when such activities will occur and the manner in which materials being removed are being disposed.
33. Identify what, if any process and/or stormwater discharges are expected to occur during any demolition activities on the property and those which will continue after demolition and/or decommissioning activities have been completed. Describe how Pepco-Benning plans to comply with any NPDES permitting requirements that apply to such process and/or stormwater discharges.
34. Provide a plan that outlines how Pepco-Benning intends to comply with its NPDES effluent limitations and the Anacostia River TMDL for metals.

VI. EFFECTIVE DATE

35. This Information Request is effective upon receipt.

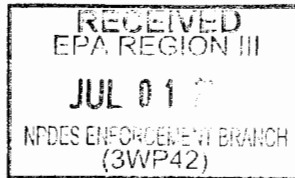
Date: 6/5/13



David B. McGuigan, Ph.D.
Associate Director
Office of Compliance and Enforcement
Water Protection Division



A. PHI Company



Legal Services

92DC42
500 N. Wakefield Drive
Newark, DE 19702

P.O. Box 6066
Newark, DE 19714-6066

June 28, 2013

VIA FEDERAL EXPRESS

Ms. Ingrid H. Hopkins
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Re: Clean Water Act, Section 308 Request for Information

Dear Ms. Hopkins:

Potomac Electric Power Company (Pepco) received EPA Region III's Clean Water Act Section 308 Request for Information regarding the Benning Generating Station (Information Request) on June 12, 2013. The Information Request does not specify a date for Pepco's response. After reviewing the Information Request, Pepco determined that it would be able to respond to EPA within 60 days after receipt. I left a voice mail message for you on June 21 to discuss a date for Pepco's response. You returned my call on June 27, leaving a voice mail message, and we finally spoke by telephone today. During today's conversation, you informed me that EPA expected a response within 30 days of Pepco's receipt of the Information Request.

Had EPA specified a return date in the Information Request, Pepco would have made every effort to provide a timely response. In the absence of a return date, Pepco believes that in fairness, EPA should grant Pepco an extension of time to respond.

Pepco hereby requests an extension of time, until August 12, 2013, to respond to the Information Request.

I look forward to hearing from you that EPA has granted the requested extension. If you have any questions, please contact me at 302-429-3144 or joanne.prestia@pepcoholdings.com.

Thank you.

Sincerely,

Joanne Scanlon Prestia
Special Counsel
Pepco Holdings, Inc.


Benning Road Generating Station pH Re-sample

Michael Williams <mwilliams@pepcoenergy.com>

Thu 12/4/2014 12:24 PM

To: Hopkins, Ingrid <Hopkins.Ingrid@epa.gov>;

Cc: fmahvi@pepco.com <fmahvi@pepco.com>; Heather Brinkerhoff <heathabrink@gmail.com>; Roger Williamson <rwilliamson@pepcoenergy.com>; Jim McNulty <jmcnulty@pepcoenergy.com>; Michael Williams <mwilliams@pepcoenergy.com>;

 1 attachment

Benning pH Re-Sample Letter to EPA December 2014.pdf;

Ms. Hopkins,

As a follow-up to our October 21, 2014 letter regarding re-sampling of Outfall 101/Manhole K, we have successfully completed the sampling during the last qualifying storm event. I am forwarding this email and letter as notification of the pH testing of the storm water composite sample taken from Outfall 101/Manhole K on December 1, 2014. I am forwarding a hard copy of the attached letter via overnight courier. If I can be of further assistance please contact me at your convenience.

Regards,

Michael V. Williams

Pepco Energy Services, Inc.

Power Plant Asset Manager

1300 North 17th Street Suite 1500

Arlington, VA. 22209

Office (703) 253-1787/ Plant (202) 288-2521

Mobile (202) 841-1344

Email: mwilliams@pepcoenergy.com



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

JUL 02 2013

Joanne Scanlon Prestia
Special Counsel
Pepco Holdings, Inc.
500 N. Wakefield Drive
Newark, DE 19702

Dear Ms. Prestia,

Thank you for your correspondence dated June 28, 2013 requesting an extension to respond to the Section 308 Request for Information dated, June 5, 2013 and received on June 10, 2013.

Request for Information documents generally require that a response is received within 30 days upon receipt. In this case, the Respondent would be expected to reply on Thursday, July 11, 2013. However, the NPDES Enforcement Branch is granting the Respondent a 30 day extension, through August 12, 2013, to provide a full and final response.

Additionally, I have included an amended page to your initial Request for Information that now includes a timeframe for providing a response. Please incorporate this page into your records.

If you have any questions or comments regarding this matter, please feel free to contact me at (215) 814-5437.

Sincerely,

A handwritten signature in cursive script, which appears to read "Ingrid H. Hopkins", is written over the typed name.

Ingrid H. Hopkins
Enforcement Officer
NPDES Enforcement Branch

Enclosure

should the Respondent find at any time after submission of its response that any portion is or becomes false, incomplete or misrepresents the facts, the Respondent must provide EPA with a corrected response, as soon as possible.

9. All submissions provided pursuant to this request shall be signed and dated by a responsible official of the Respondent and include the following certification:

"I certify that the information contained in or accompanying this submission is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. I certify as having responsibility for the persons who, acting under my direct instruction, made the verification, that this information is true, accurate and complete."

Signed: _____
Title: _____

10. Within thirty (30) days upon receipt of this document, submit your response to:

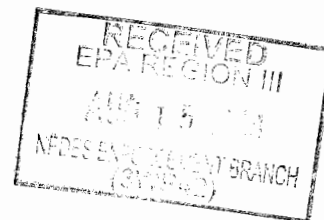
Ingrid H. Hopkins
NPDES Enforcement Branch (3WP42)
Water Protection Division
U.S. Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103-2029

11. If you have questions regarding this Information Request, you may contact Ingrid H. Hopkins, at (215) 814-5437.

IV. DEFINITIONS

12. The terms "document" and "documents" shall mean any format that records, stores or presents information and includes writings, memoranda, records or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, storage device or hard copy, including any form or format of these types. If in computer format or memory, each such document shall be provided in a translated form that is useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include: (a) copy of each document which is not an exact duplicate of a document which is provided; (b) each copy which has any writing, notation, or the like on it; (c) drafts; (d) attachments to or enclosures with any document; and (e) every other document referred to or incorporated into each document.

August 12, 2013

Via Electronic Mail
and US Mail

Ms. Ingrid H. Hopkins
NPDES Enforcement Branch (3WP42)
Water Protection Division
U.S. Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103-2029

Re: Responses to EPA's Clean Water Act, Section 308 Request for Information

Dear Ms. Hopkins:

This letter is in response to the above referenced Request for Information received by Potomac Electric Power Company (Pepco) on June 12, 2013. The EPA's Request for Information requires that Pepco provide information regarding the closure of the Benning Generating Station and NPDES discharges associated with the Benning facility NPDES Permit No. DC0000094. This response is timely submitted in accordance with your letter to Joanne Prestia dated July 2, 2013, granting an extension to August 12, 2013.

We note that many of the information requests relate to facility-wide storm water management under the terms of the NPDES permit, while certain others relate to the decommissioning of the Benning Generating Station. As a point of clarification, the Benning facility is comprised of several distinct operations. In addition to the Benning Generating Station, which was shut down in June of 2012, the facility also serves as a major service center to support Pepco's operation of its electric transmission and distribution system, and houses three electric substations. Pepco owns the entire site, and operates the service center and the substations. The Benning Generating Station is owned by Potomac Power Resources, LLC, which is a subsidiary of Pepco Energy Services, Inc. (PES). PES and Pepco are subsidiaries of Pepco Holdings, Inc. The generating station occupies the site pursuant to an easement granted by Pepco. The NPDES permit is held by Pepco, and covers all of the site operations, including the Benning Generating Station and the Pepco service center and substations. Responses to the information requests are based on input from both Pepco and PES personnel as appropriate.

Pepco's responses to the Request for Information letter are as follows:

Part III. INSTRUCTIONS

5. Identify each person responding to any question contained in this Information Request on behalf of the Respondent, as well as each person consulted in the preparation of the response. Include each person's name, professional title, and contact information.

Response: **Attachment 1** identifies the persons who prepared the response, or who were consulted in the preparation of the response, to any of the questions contained in the Information Request. These individuals can be contacted through Fariba Mahvi at (202) 331-6641 or fmahvi@pepco.com.

Part V. INFORMATION REQUEST

17. Describe the process that Pepco-Benning has implemented to identify the source or potential source(s) of heavy metals entrained in discharges from the NPDES permitted outfall 013. In your response, include:

- (a.) the dates that Pepco-Benning first became aware of the heavy metals excursions;

Response: The first metal excursion under the current NPDES permit occurred in October 2009 when the daily maximum concentration of Copper in the storm water discharge from Outfall 013 exceeded the permit limit. This excursion was reported to EPA on October 19, 2009, and a follow up letter was filed on October 23, 2009. There were no metal excursions during the following sampling event in the first quarter 2010.

The Benning facility next experienced metal excursions in April 2010 when daily maximum concentrations for Copper, Iron, and Zinc in the storm water discharge from Outfall 013 exceeded the NPDES permit limits. The excursions were reported to EPA on April 13, 2010. A follow up letter was filed on April 16, 2010, reporting that the investigation by plant personnel revealed that the snowmelt from the record February 2010 snow storms --over 32 inches of snow in a month-- accompanied by sand and salt from the plowing activities were believed to be a contributing factor to the metal excursions at Outfall 013.

- (b.) the process used to determine the source(s) or potential source(s) of the heavy metals excursions;

Response: As described in the correspondence to EPA cited above, plant personnel attempted after each excursion event to determine the cause and source of metal excursion and take appropriate actions to avoid further excursion. In addition, in early 2010, Pepco undertook a comprehensive evaluation of the facility's storm water quality as required by the terms of the facility's NPDES permit, with the understanding that this evaluation would help identify the source of the recent metals excursions and lead to the implementation of appropriate corrective measures in the form of additional or enhanced best management practices (BMPs). At that time, Pepco engaged the services of AMEC (formerly MACTEC), an environmental consulting firm, to evaluate the effectiveness of existing BMPs as part of the facility's Storm Water Pollution Prevention Plan (SWP3) and develop three plans -- the TMDL Implementation Plan, the Iron Source Tracking and Pollutant Minimization Plan, and the PCB Source Tracking and Pollutant Minimization Plan. On July 19, 2010, Pepco submitted the three plans to EPA (Ms. Mary Letzkus) for review and approval. Each plan outlined an "adaptive management approach" involving the iterative implementation of control measures focusing first on the sources or controls expected to have the largest impact on water quality, coupled with a monitoring plan to assess progress toward attainment of the water quality goals. On September 28, 2010, Ms. Letzkus advised Pepco that she had no comments on the plans and authorized Pepco to proceed.

- (c.) the personnel involved in the decision to adopt this particular process; and

Response: The process was proposed by Pepco's consultant, AMEC, and was adopted by Pepco environmental staff (Fariba Mahvi) with the concurrence of EPA, as described above.

- (d.) the processes implementation schedule.

Response: As explained in correspondence submitted to EPA (Ms. Mary Letzkus) on August 3, 2012, the first step for implementing each plan was a detailed assessment of potential source areas and the effectiveness of existing BMPs implemented as part of the facility's Storm Water Pollution Prevention Plan. AMEC conducted two storm water sampling events (in addition to the quarterly sampling required under the permit), in May and September 2011. Following these sampling events, AMEC conducted a site inspection in November 2011 to assess site conditions associated with the storm water drainage system. AMEC prepared a comprehensive inventory of potential sources of storm water contamination, and assessed the

condition of all of the inlets to the storm drain system at the site. AMEC also evaluated three existing Low Impact Development (LID) structures to assess their effectiveness in reducing storm water contamination. In addition to these efforts by AMEC, Pepco completed several upgrades to the storm water system, including the installation of an underground sediment filtration vault for storm water originating from the Gas Insulating Switchgear yard.

Based on the results of the sampling events, the site inspections, and evaluations of existing control measures, AMEC developed recommendations for additional measures to reduce storm water contamination at the site. These measures would be implemented in three phases. Phase I measures consisted primarily of installing metal and oil absorbing filters and booms in and around storm water inlets. Implementation of these measures was completed in November 2012. Phase II measures consisted mainly of removing stored equipment and materials from areas exposed to the weather, covering and painting exposed metal pipes, and improving housekeeping practices. Implementation of these measures was completed in December 2012. Phase III measures, which include installation of additional LID structures, converting impervious surfaces to rain gardens or infiltration swales, and installation of additional filtering structures, will be implemented at a future time to achieve the TMDL goals. These Phase I, II, and III measures were listed in tracking tables (referred to as Tables 8, 9, and 10) prepared by AMEC as part of a status report provided to Pepco in May 2012. Copies of these tables, showing the status of implementation of each measure along with the text of the AMEC status report were included with the submission to EPA on August 3, 2012.

18. Provide an outline that describes in detail the activities that Pepco-Benning conducted to minimize the metals excursions at Outfall 013 and throughout the site. Include:

- (a.) the timeframe for final application and the expected outcomes;

Response: As described in response to question 17.d above, the activities conducted to minimize the metals excursions at Outfall 013 and throughout the site were implemented in two phases, Phase I (inlet maintenance) and Phase II (metal management). Implementation of Phase I control measures was completed in November 2012. Implementation of Phase II control measures was completed by December 31, 2012. During the implementation process, EPA (Ms. Mary Letzkus) was kept informed of the status of these efforts. Status reports along with updated Tables 8 and 9 (used as a tool for tracking the implementation of the control measures) were submitted to Ms. Letzkus on September 4, September 28,

November 2, and December 4, 2012; and January 7, 2013.

Since completion of Phase II control measures in December 2012, further measures to reduce metal excursions have been implemented as part of the ongoing implementation of the TMDL Plan. These measures, such as removal of additional metal sources, are identified in updated version of Tables 8 and 9 which are attached to this response at **Attachment 2**. The next step includes implementation of Phase III control measures as identified in the TMDL Plan (i.e., installation of additional LID structures) to achieve compliance with the permit limits.

- (b.) the one-time cost of each BMP applied;

Response: The one-time estimated cost is as follows:

- Initial cost for purchasing the storm drain inlet maintenance products (booms and filters) was \$15,000.00
- Initial labor cost for installing the products at the storm drain inlets throughout the facility was \$10,500.00
- Cost for keeping a stock of products to support the on-going maintenance efforts was \$8700.00.

- (c.) the maintenance schedule and the costs associated with maintenance of each BMP.

Response: Monthly inspections and maintenance of storm water inlets is being conducted throughout the site as part of the facility's SWP3 to minimize potential sources of metals. Additional inspections are also conducted after heavy storms to ensure that the control measures applied at the storm drain inlets (i.e., filters/booms/socks) remain intact. The average labor cost for site-wide inspection and maintenance of the storm water inlets is approximately \$ 15,000 per month.

19. Phase I of the TMDL Implementation Plan required Inlet Maintenance. Has Pepco-Benning evaluated the effectiveness of the metal absorbing inlet guards, applied at all the storm drain inlets throughout the facility, If so, provide the process used to evaluate the BMPs and any reports or documents developed as a result of the evaluation conducted. If an evaluation has not been completed, provide a date certain for when an evaluation will be conducted and

provide the evaluation immediately thereafter.

Response: Pepco has evaluated and continues to evaluate the effectiveness of the metal absorbing inlet guards applied at all the storm drains throughout the facility as part of the ongoing implementation of the TMDL Plan.

Subsequent to the implementation of the Phase I measures, representatives from the manufacturer (Ultra Tech International Inc.) and supplier (Safeware Inc.) of the storm drain inlet maintenance products visited the facility on February 13 and April 3, 2013. During their visits, they inspected each storm drain inlet to determine (1) if a correct product type was applied to each storm drain inlet for maximum metal removal efficiency, and (2) if the correct product type was selected, was it installed in accordance with the manufacturer's instructions. Email correspondence from Safeware forwarding its recommendations for improving the inlet BMPs is provided at **Attachment 3**. Based on their recommendations, additional measures were implemented. For example, the existing metal removal inlet guards were replaced with the heavy duty types at various storm drain inlets including the ones located in the vicinity of the transformer unloading area, and sediment removal absorbing socks were installed around the inlets where there are potential for sediment and debris entering the storm drains during the demolition activities associated with the generating station closure. The updated version of Table 8 at Attachment 2 reflects these additional measures implemented in April and June of 2013.

20. At the six (6) storm drains that could not be outfitted with metal absorbing inlet guards, please describe the BMPs that were applied in response to the TMDL Implementation Plan, if any. Include the maintenance required, the maintenance schedule and associated costs.

Response: The six (6) storm drains (identified in Table 8 as inlets 01, 05, 09, 13, 14, and 33) were revisited by Safeware Inc. (the supplier) to determine what type of BMPs could be applied at those drains. The configuration of inlets 01, 05, 09 and 33 would not allow for installation of oil/metal absorbing materials, therefore, to reduce the risk of metal entering the drains, metal or heavy equipment were removed from the adjacent areas. The design of inlet 13 was modified to allow for installation of a metal absorbing filter inside the inlet and a sediment removal sock around it. Inlet 14 became accessible after removal of aboveground cooling pipes to allow for installation of a metal absorbing filter. A custom made filter was installed in this drain. These storm drain inlets are inspected monthly along with the other inlets throughout the facility. The maintenance schedule and associated cost are outlined in the response to question 18 (d) above.

21. Phase II of the TMDL Implementation Plan required Metals Management. Under Phase II, Pepco-Benning has either sheltered or removed equipment and materials previously exposed to wet weather. Please explain the effect that the adoption of the Phase II Metals Management Plan has had on the metals excursions at Outfall 013, to date. If costs were associated with this effort, please provide a cost schedule.

Response: The initial implementation of Phase II control measures was completed by December 31, 2012. The only data available to determine the effect that the adoption of the metal management practices has had on the metals excursions at Outfall 013 to date are the analytical results of the first and second quarters 2013 storm water samples from Outfall 013.

The first quarter storm water sample was collected in January 2013. AMEC calculated the percentage reduction of pollutant concentrations in storm water discharges from Outfall 013 based on the analytical results of the first quarter sample. The calculations showed a significant decrease in metal concentrations in storm water discharges from Outfall 013 compared to baseline concentrations. Specifically the following percent reductions were obtained: **Cadmium - 100%, Copper - 73%, Iron - 84%, Lead - 77%, and Zinc - 87%.** This analysis was submitted to EPA along with the January 2013 DMRs.

The second quarter storm water sample was collected in June 2013. As shown in the analysis submitted to EPA along with the June 2013 DMRs, the concentrations of Copper, Iron, and Zinc were higher than for January 2013; however, they were still well below the baseline concentrations, which confirmed that the control measures already taken have been effective to reduce metals loading in storm water discharges from the site. The June 2013 concentrations also reflect baseline percentage reductions that continue to meet the pollutant load reduction requirements under the Anacostia River TMDL for metals.

In 2012, the total cost to implement the Phase II metals management program was approximately \$20,000. Pepco is continuing to implement the metals management program on an ongoing basis, taking steps to promptly remove or cover equipment and materials that are brought to the Benning service center in connection with the transmission and distribution system maintenance activities. The labor cost for this ongoing metals management effort is approximately \$5000 per month.

22. As required by NPDES Permit No. DC0000094, issued on June 19, 2009, provide a copy of the approved TMDL Implementation Plan for Pepco-Benning's planned activities toward meeting the required load reductions for the Anacostia River TMDL for metals.

Response: Pepco submitted the TMDL Implementation Plan to EPA (Ms. Mary Letzkus) on July 19, 2010. On September 28, 2010, Ms. Letzkus advised Pepco that she had no comments on the plans and authorized Pepco to proceed.

23. Describe any additional measures implemented, resources utilized or plans developed to minimize or eliminate metals excursions at the facility.

Response: Pepco has taken the following additional actions to minimize or eliminate metals excursions at the facility:

- The plant has developed additional measures to protect the storm drain inlets during the generating station demolition activities. This includes covering all inlets affected by the demolition activities with mesh filter fabric and securing the fabric with clean rocks. These measures were implemented in addition to the existing filters and socks in place.
 - Fuel Oil Tanks (No.1, 2, 3 and 4) and connected metal piping, and fuel oil recirculating system including tank, piping and containment wall were demolished and removed as part of the generating station closure. Table 9 - Metal Management has been updated to reflect these activities.
 - The facility's Storm Water Pollution Prevention Plan (SWP3) was last revised in June 2012. That revision incorporated the recommendations made in AMEC's status report for additional BMPs to reduce metal excursions in storm water discharges. The SWP3 is presently being further revised.
24. In July 2012, Pepco-Benning notified EPA, Region 3 that AMEC, Pepco's - Benning's consultant and storm water sampling contractor, conducted an initial review of historic metals concentrations. AMEC was also preparing to further investigate the excessively high metals results. Please provide a final analysis of the initial review and the investigation.

Response: The results of AMEC's review were provided to EPA (Ms. Ingrid Hopkins) in a letter dated July 27, 2012.

25. Provide a facility schematic, identifying the "hotspots" identified and annotate where the BMPs have been implemented at storm drain inlets and across the site, to reduce or eliminate metals excursions.

Response: AMEC conducted two storm water sampling events in May and September 2011 as referenced in response to question 17 (d). Sampling event 1 results indicated that the highest concentrations of metals, specifically Iron, were detected at sampling locations identified as Iron 2, Iron 3, Iron 5 and Iron 9a. The locations of these sampling points are depicted on Figure B-1 from AMEC's May 2012 status report. A copy of Figure B-1 is provided at **Attachment 4**. Sampling location Iron 8 had an elevated level of Zinc. During sampling event 2, all these locations were resampled to verify that the elevated metal concentrations were present. To narrow down potential source areas of metals, additional locations within the catchment areas of Iron 2, Iron 3 and Iron 5 were sampled. The catchment area containing Iron 2 was sampled at Iron 2a, Iron 2b, Iron 2c, and Iron 2d. The catchment area containing Iron 3 was sampled at Iron 3a.

Results from sampling event 2 indicated that the highest iron concentrations occurred at Iron 2, Iron 2a, Iron 2c, Iron 2d, Iron 3a, Iron 5 and Iron 9a. Elevated Lead and Zinc concentrations were also found at Iron 3a. TSS was the highest at Iron 2, Iron 2a, Iron 2c, Iron 3a, Iron 5 and Iron 9a. The locations of these sampling points are depicted on Figure B-7 from AMEC's May 2012 status report. A copy of Figure B-7 is provided at **Attachment 5**.

The BMPs that have been implemented at each sampling location identified above or its corresponding storm drain inlet are as follows:

- Iron 2 (storm water manhole located between storm drain inlets 07 and 08), Iron 2a (inlet 04), Iron 2b (inlet 05), Iron 2c (inlet 03), Iron 2d (inlet 02). Metal removal inlet guard was installed inside each storm drain inlet and an oil absorbing boom was installed around it. These inlets are located near the former fuel oil tanks 1-3. The tanks were demolished in April 2013 as part of the generating station closure.
- Iron 3a (inlet 65) - Metal removal inlet guard was installed inside the storm drain inlet and an oil absorbing boom was installed around it.
- Iron 5 (Discharge 414) - The closest storm drain inlet is 37. Metal removal inlet guard was installed inside this storm drain and an oil absorbing boom was installed around it.
- Iron 9a (inlet 46) - Heavy duty metal removal inlet guard was installed inside the inlet and an oil absorbing boom was installed around it.

26. Identify Pepco-Benning's plans for the proposed use(s) for the Pepco-Benning Generating Station after its closure.

Response: The Benning Generating Station has been placed in an idled condition where all systems have been deactivated, chemicals and fuel removed, and certain buildings and equipment have been removed or demolished. Additional demolition of the generating station is being considered. There is presently no planned re-use for the generating station or the area of the Benning site occupied by the generating station facility. Pepco will continue to operate the site as a transmission and distribution service center and will continue to operate the three electric substations at the site.

27. Provide any final agreements, contracts, memoranda of understanding or similar documents between Pepco-Benning and any other entity, relating to the closure and/or sale, of the Pepco-Benning Generating Station.

Response: There are no plans to sell the Benning Generating Station. On February 28, 2007, Pepco Holdings Inc. announced that its subsidiary and owner of the Benning Generating Station intended to retire the generating station subject to the approval of the regional grid operator, PJM Interconnection, LLC (PJM).

The documents requesting PJM's approval of the deactivation of the Benning Road Generating Station (dated February 28, 2007) and the approval of this request by PJM Interconnection, LLC (dated May 31, 2007) are provided at **Attachments 6 and 7**.

28. Identify any and all approvals from any federal, state or local governmental entity which are required for the transfer of ownership and/or decommissioning of the Pepco-Benning Generating Station. Provide any and all documents related to such approvals, the date of submittal of each document and identify the name of the person or entity to which it was submitted.

Response: No transfer of ownership is planned for the Benning Generating Station. The only governmental approvals required for the decommissioning of the generating station (other than demolition permits described in response to question 30 below) are (1) amendments to the Title V air permit issued by the District Department of the Environment to terminate certain emissions units formerly associated with the generating station and transfer the permit to Pepco; and (2) new Chapter 2 non-major source permits for certain emission sources that Pepco is continuing to operate. DDOE issued the Title V permit amendment by correspondence dated March 4, 2013. A copy of the permit amendment correspondence is provided at **Attachment 8**. Pepco

submitted applications for the Chapter 2 permits on March 12, 2013. A copy of permit application correspondence is provided at **Attachment 9**. The chapter 2 permit application is still under review by DDOE.

29. Provide copies of any financial or legal documents which relate to the transfer and/or closure of the facility.

Response: There are no plans to transfer or sell the generating station facility. Relevant documents related to the closure of the generating station are identified in response to questions 27, 28, and 30.

30. Identify and produce copies of permits for the demolition of any structures, process wastewater and storm water outfalls and associated piping.

Response: Copies of DCRA's permits for the razing of the pump houses and two clarifiers and demolition permits for cooling towers, foam suppression system and four above ground storage tanks are provided at **Attachment 10**.

31. Identify the manner in which the environment, including surface water, air and groundwater will be protected before during and after any demolition activities.

Response: PES's generating station closure procedures include the use of engineering controls for prevention of releases of construction debris and waste streams from reaching the surface water and groundwater. Dust control measures are put into effect for any demolition activities as necessary in accordance with the requirements of the Benning facility's Title V air permit. All asbestos containing materials are abated prior to material salvage or, if abatement is not possible (such as the case with concrete construction debris containing asbestos) disposed of in an approved landfill. Manifests are available for the materials removed.

Throughout the demolition activities, site and construction personnel are continuing to perform regular daily inspections and NPDES compliance monitoring. In addition, demolition work plans include controls for potential discharges, such as immediate collection and disposal of demolition debris, cutting and capping appurtenances, and, if necessary, collection of waste water in temporary frac tanks until testing is completed for waste characterization.

32. Provide a schedule detailing what structures will be taken out of service, dismantled or otherwise removed from the property; when such activities will occur and the manner

in which materials being removed are being disposed.

Response: PES has already removed the following equipment from the Benning Generating Station site – the fuel oil tanks and fuel delivery equipment, the oil house and related piping, the cooling tower clarifier building, the ash tanks, the above ground cooling water pipes, the transmission equipment and exterior isolation transformers associated with the generating station. . All equipment and materials that have been removed from the site have been tested for hazardous materials and, where necessary or possible, abated. The cooling towers are tentatively scheduled to be removed in August 2013. Testing of the cooling tower basins, which are suspected to contain PCB contaminated material, is proceeding and will be completed prior to the demolition. The materials removed during demolition will be disposed of in accordance with applicable legal requirements.

33. Identify what, if any process and/or storm water discharges are expected to occur during any demolition activities on the property and those which will continue after demolition and/or decommissioning activities have been completed. Describe how Pepco-Benning plans to comply with any NPDES permitting requirements that apply to such process and/or storm water discharges.

Response: Process and storm water discharges will continue to occur during and after the demolition and/or decommissioning activities of the generating station and will be monitored in compliance with the facility's NPDES permit. Accordingly, the two (2) existing Oil Water Separators (OWS) located ahead of internal monitoring points 003 and 201 will remain in service to treat wastewater streams. The OWS located ahead of monitoring point 003, is a treatment system designed to remove oil and grease and solids from water which is pumped from Pepco's utility manholes within the District of Columbia and transported to the Benning Service Center. The OWS located ahead of monitoring point 201 is a treatment system which was designed to treat a variety of wastewater streams associated with the operation of the generating station. . Since the closure of generating station in June 2012, this system has remained in service to treat yard drainage. The discharges to both monitoring points are sampled quarterly. Likewise, the storm water discharges to Outfalls 013 and 101 will be sampled quarterly. Site personnel continue to ensure compliance with all conditions of the NPDES permit.

34. Provide a plan that outlines how Pepco-Benning intends to comply with its NPDES effluent limitations and the Anacostia River TMDL for metals.

Response: Please see the responses to questions 17 through 23 above.

Please be assured that Pepco is fully committed to conducting all activities at the Benning facility in compliance with the terms of the site NPDES permit. As such, Pepco has implemented sustainable corrective measures to address the metal excursions in the storm water discharges from the facility.

I certify that the information contained in or accompanying this submission is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. I certify as having responsibility for the persons who, acting under my direct instruction, made the verification, that this information is true, accurate and complete.

If you have any questions or require additional information regarding this submittal, please contact Fariba Mahvi at (202) 331-6641 or fmahvi@pepco.com.

Sincerely,



George P. Nelson
Vice President, Operations and Engineering
PHI Service Company

cc: Mr. David B. McGuigan, Ph.D., Associate Director, Water Protection Division, EPA
Region III Office of NPDES Permits and Enforcement,
Mr. Collin Burrell, Associate Director, Water Quality Division, DDOE

Attachments

Attachments

- Attachment 1: Response to Part III.5 of EPA's Request for Information letter
- Attachment 2: Updated Tables 8 and 9
- Attachment 3: Email Correspondence from Safeware Inc.
- Attachment 4: Figure B-1, AMEC's 2012 Status Report
- Attachment 5: Figure B-7, AMEC's 2012 Status Report
- Attachment 6: Deactivation Notice Benning and Buzzard Generating Stations
- Attachment 7: PJM Letter dated May 31 2007.docx
- Attachment 8: DDOE's Title V Permit Amendment Correspondence
- Attachment 9: Pepco's Title V Permit Application Correspondence
- Attachment 10: DCRA Raze and Demolition Permits

Attachment 1

Attachment 1

Response to Part III.5 - EPA Request for Information

Name	Professional Title
Fariba Mahvi	Lead Environmental Engineer, Environmental Services , Pepco Holdings, Inc.
Heather Brinkerhoff	Environmental , Health and Safety Consultant, HB Consultant, LLC
Michael Williams	Power Plant Asset Manager, Pepco Energy Services
Ron Studds	Manager, Waste Management, Pepco
Timmy Dinsmore	Supervisor, Waste Management Department, Pepco
Andy Hart	Manager, Stores/General Shop, Pepco,
William Spruill	Supervisor, Substation Maintenance and Construction, Pepco
Kenny Payne	General Supervisor, Distribution, Pepco
George Hume	Lead Engineering Associate, Field Operations and Restoration, Pepco
Pam Maines	VP, Operations, Pepco Energy Services
Colin Danville	Lead Environmental Engineer, Environmental Compliance & Performance, Pepco Holdings, Inc.

Attachment 3



Storm Drains
Eddie Arthur

to:

fmahvi@pepco.com, restudds@pepco.com, 'Heather Brinkerhoff'
03/10/2013 09:15 PM

Hide Details

From: Eddie Arthur <egarthur@safewareinc.com>

To: "fmahvi@pepco.com" <fmahvi@pepco.com>,
"restudds@pepco.com" <restudds@pepco.com>, "Heather
Brinkerhoff" <heathabrink@gmail.com>,

2 Attachments



Pepco Storm Drains Revised.xlsx

Good morning,

Attached is the revised spreadsheet with pricing for the items that have been recommended for change. These are only recommendations, so I am not including pricing on all items for stocking purposes until it is determined which, if any of the recommendations you are going to accept. On the spreadsheet, there are a total of 27 recommended changes. Seven of those are at the Plant. These were all recommended because of the demolition work currently taking place that had not begun when these were first installed. Another seven drains are being recommended to change to the heavy metal versions around the transformer shop. These were recommended during the initial install, but those drains already had guards in place and were never changed out to the heavy metal version. The one product that we have recommended changing out is the curb guards. There are twelve of these currently in place. It is not so all based on performance, but rather ease of use. The curb drains at Pepco are more narrow than normal drains and have caused the current product in place to stick out slightly from the curb. These have been installed with sand bags to help keep them in place and appear to be working. The recommended new product for these drains is less expensive and easier to install and those are the reasons for the recommendation.

After discussing with the manufacturer, they have agreed to special contract pricing for Pepco to help with any additional costs. I hope that you find this to be a fair offer. Once I hear back on which recommendations you would like to pursue, I will revise the spreadsheet with pricing on all items to submit to purchasing for stocking purposes. In addition to the recommended product changes, we have also recommended the addition of sediment or heavy metal socks in addition to the drain guards. These are primarily for the Plant drains. The pricing for those items and the retention rods are listed below.

9457 (sediment sock)- \$63.64/each
9454 (heavy metal sock)- \$120.78/each
9237 (22"-36" retention rods)- \$31.17/set of 2
9238 (36"-62" retention rods)- \$44.15/set of 2

Based on the site re-visit a few weeks ago and the analysis of the sampling results that were given to us, we believe that these changes will help Pepco continue to decrease pollutants entering the water stream. If you would like to sit down and discuss any questions or concerns, please let me know and I will be happy to meet.

Thank you,

Edward Arthur, QSSP
Account Executive
Safeware Inc.
Cell: (240) 882-4068
egarthur@safewareinc.com



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Facilities

<u>Drain Number</u>	<u>Dimensions</u>	<u>Old Part #</u>	<u>Inspection Frequency</u>	<u>Status</u>	<u>Comments</u>	<u>New Part#</u>	<u>Price of New Item</u>
71	70"x37"		Monthly	Good		9230 70x37	
72	24" Round	9217	Monthly	Good		9217	
74	32"x32"	9356	Monthly	Good		9356	
76	35"x35"	9356	Monthly	Good	Add retention rods; Part# 9237	9397	
73	32"x32"	9356	Monthly	Good		9356	
75	35"x35"	9356	Monthly	Good	Add retention rods; Part# 9237	9397	
77	35"x35"	9356	Monthly	Good	Add retention rods; Part# 9237	9397	
69	70"x37"	custom	Monthly	Good		9230 70x37	
70	70"x37"	custom	Monthly	Good		9230 70x37	
68	66" long	custom	Monthly	Change	Switch to Ultra-Curb Guard Plus	9248 x 2	\$88.30
67	24" Round	9217	Monthly	Good	Add heavy metal sock (part# 9454) Add heavy metal sock (part# 9454) underneath of grate	9217	
65	24"x27"	9397	Monthly	Good		9397	
66	50"x45"	9356	Monthly	Good		9356	
56	35"x35"	9356	Monthly	Good		9356	
58	35"x35"	9356	Monthly	Good	Add heavy metal sock (part# 9454)	9356	
57	24" Round	9356	Monthly	Change	Install heavy metal model	9397	\$257.14
97	24'x1'	Socket	Monthly	Good		9454	
60	59" long	custom	Monthly	Change	Switch to Ultra-Curb Guard Plus	9248 x 2	\$88.30
61	117" long	custom	Monthly	Change	Switch to Ultra-Curb Guard Plus	9251 x 3	\$105.19
62	117" long	custom	Monthly	Change	Switch to Ultra-Curb Guard Plus	9251 x 3	\$105.19
62	51" long	custom	Monthly	Change	Switch to Ultra-Curb Guard Plus	9248 x 2	\$88.30
63	117" long	custom	Monthly	Change	Switch to Ultra-Curb Guard Plus	9251 x 3	\$105.19
63	51" long	custom	Monthly	Change	Switch to Ultra-Curb Guard Plus	9248 x 2	\$88.30
64	51" long	custom	Monthly	Change	Switch to Ultra-Curb Guard Plus	9248 x 2	\$88.30
40	233" long	custom	Monthly	Change	Switch to Ultra-Curb Guard Plus	9251 x 5	\$105.19
38	117" long	custom	Monthly	Change	Switch to Ultra-Curb Guard Plus	9251 x 3	\$105.19
39	117" long	custom	Monthly	Change	Switch to Ultra-Curb Guard Plus	9251 x 3	\$105.19
48	24"x24"	9217	Monthly	Good		9217	
49	145"x12"	9255	Monthly	Good		9255 145x12	
49	145"x12"	9255	Monthly	Good		9255 145x12	
47	27"x27"	9217	Monthly	Change	Change to heavy metal version	9397	\$257.14
46	27"x27"	9217	Monthly	Change	Change to heavy metal version	9397	\$257.14
45	27"x27"	9217	Monthly	Change	Change to heavy metal version	9397	\$257.14
44	27"x27"	9217	Monthly	Change	Change to heavy metal version	9397	\$257.14
43	27"x27"	9217	Monthly	Change	Change to heavy metal version	9397	\$257.14

42	27"x27"	9217	Monthly	Change	Change to heavy metal version	9397	\$257.14
54	117" long	custom	Monthly	Change		9251 x 3	\$105.19
53	52"x59"	9255	Monthly	Good		9255 60x70	
51	65"x49"	9255	Monthly	Good		9397 84x60	
52	24" Round	9217	Monthly	Good		9217	
8	26" Round	9217	Monthly	Good	Add sediment sock (part# 9457)	9217	
37	27"x27"	9217	Monthly	Good		9217	
30	24" Round	9217	Monthly	Change?	Change to basin guard and add sediment sock (part# 9457)	92920S	\$120.50
3	27"x27"	9217	Monthly	Good		9217	
2	27"x27"	9217	Monthly	Good	Install higher	9217	
78	16"x16"	9217	Monthly	Good		9217	
79	14"x14"	9217	Monthly	Good		9217	
80	24" Round	9217	Monthly	Good		9217	
81	10"x18"	9217	Monthly	Good		9217	
50	29"x32"	9217	Monthly	Good		9217	
82	19"x19"	9217	Monthly	Good		9217	
83	19"x19"	9217	Monthly	Good		9217	
6	24"x24"	9217	Monthly	Good	Add sediment sock (part# 9457)	9217	
9	???		Monthly	Add	Add 2 heavy metal socks (part# 9454) and small downspout guard		

Plant Drains

85	20"x20"	9166	Monthly	Change	Switch to 9217	9217	\$46.15
21	20" Round	9217	Monthly	Good	Add heavy metal sock (part# 9454)	9217	
12	24" Round	9166	Monthly	Good	Try installing on top and add sediment sock (part# 9457)	9166 24IN	
11	24" Round	9166	Monthly	Good	Add sediment sock (part# 9457)	9166 24IN	
10	18" Round	9166	Monthly	Good	Add sediment sock (part# 9457), rocks and push back soil and rocks away from drain	9166 18IN	
22	13" Round	9166	Monthly	Good		9166 13IN	
23	13" Round	9166	Monthly	Good		9166 13IN	
20	22"x49"	9166	Monthly	Good		9166 22x49	
24	18"x25"	9166		N/A	Build drain up; has a plastic grate that won't hold anything	9166 18x25	
15	36"x40"	9166	Monthly	Good		9166 36x40	
18	31"x31"	9166	Monthly	Change	Switch to 9217	9217	\$46.15
17	45"x45"	9166	Monthly	Good		9166 45x45	
25	30" Round	92920S	Monthly	Good	Add sediment sock (part# 9457)	92920S	

28	35"x35"	9166	Monthly	Change	Switch to 9356 and add 2 sediment socks (part# 9457)	9356	\$58.46
29	24" Round	9217	Monthly	Good	Add sediment sock (part# 9457)	9217	
32	24" Round	9217	Monthly	Good		9217	
31	24"x30"	9166	Monthly	Add	Add 9166; nothing in place	9166 24x30	\$47.10
26	24" Round	9217	Monthly	Good		9217	
16	24" Round	9166	Monthly	Good		9166 24IN	
35	44"x49"	9166	Monthly	Good	Add sediment sock (part# 9457)	9166 44x49	
34	30"x34"	9217	Monthly	Good	Add sediment sock (part# 9457)	9217	
33	24" Round		Monthly	Add	Add a couple of packs of microbes every couple of months	5232 \$103.90/box of 24	
19	31"x31"	9166	Monthly	Good		9166 31x31	
1	24"x36"		Monthly	Add	Add heavy metal socks (part# 9454) around frame	9454	
7	36"x63"	9166	Monthly	Change	Switch to 9356 with retention rods; Part# 9238	9356 48x70	\$68.70
4	24"x24"	9166	Monthly	Change	Switch to 9217	9217	\$46.15
5	24"x24"	9166	Monthly	Change	Switch to 9217 if you can get grate up	9217	\$46.15
13	42" Round	9166	Monthly	Change	Switch to 9356 with sediment sock (part# 9457)	9356	\$58.46
27	56'x1'		Monthly	Add	Add a heavy metal sock (part# 9454)	9454	



Review of Meeting

Eddie Arthur

to:

restudds@pepco.com, fmahvi@pepco.com, Heather Brinkerhoff,
tbdinsmore@pepco.com, khpayne@pepco.com

04/04/2013 10:10 AM

Hide Details

From: Eddie Arthur <egarthur@safewareinc.com> Sort List...

To: "restudds@pepco.com" <restudds@pepco.com>,
"fmahvi@pepco.com" <fmahvi@pepco.com>, Heather Brinkerhoff
<heathabrink@gmail.com>, "tbdinsmore@pepco.com"
<tbdinsmore@pepco.com>, "khpayne@pepco.com"
<khpayne@pepco.com>,

History: This message has been replied to and forwarded.

2 Attachments



Pepco Storm Drains Revised.xlsx

Good morning,

I wanted to send a summary of the items we discussed yesterday as well as keeping Fariba and Ron in the loop on our progress. I have attached the spreadsheet again for your review with the most recent recommendations. Kenny asked about the amount of custom items that are in place. You will see that I have added a column to identify those products that are standard and those that are custom. Because of the irregular drains at the Plant, there are a number that are custom. But the majority of those in place around Facilities are standard products. Below are a few bullet points to update everyone on items that were discussed yesterday.

- Curb replacements- Tim asked about the replacement product being recommend to change out. I have sent Tim and Kenny a link with more information. If you would like to pursue the new product, let me know and I will get a sample for review.
- References- I have a message into Sam Bates regarding references that he may be able to provide to you. I will follow up once I receive that information.
- Stocking product at Pepco- Heather has already placed an order and received the majority of product with the recommended changes. I have not made any movement for the Facilities since I have not heard back on the recommendations. I would prefer not to send Purchasing any information on part numbers and pricing until it is decided if Facilities is going to stick with the products that are currently in place or move forward with some or all of the recommendations. Once that is determined, I will work with Purchasing on getting stock numbers set up for inventory at Building 88.

Please let me know if I forgot anything or if anyone has questions on the information above.

Thank you,

Edward Arthur, QSSP
Account Executive
Safeware Inc.
Cell: (240) 882-4068
egarthur@safewareinc.com



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Facilities

<u>Drain Number</u>	<u>Dimensions</u>	<u>Old Part #</u>	<u>Inspection Frequency</u>	<u>Status</u>	<u>Comments</u>	<u>New Part#</u>	<u>Price of New Item</u>
71	70"x37"		Monthly	Good		9230 70x37	Custom
72	24" Round	9217	Monthly	Good		9217	Standard
74	32"x32"	9356	Monthly	Good		9356	Standard
76	35"x35"	9356	Monthly	Good	Add retention rods; Part# 9237	9397	Standard
73	32"x32"	9356	Monthly	Good		9356	Standard
75	35"x35"	9356	Monthly	Good	Add retention rods; Part# 9237	9397	Standard
77	35"x35"	9356	Monthly	Good	Add retention rods; Part# 9237	9397	Standard
69	70"x37"	custom	Monthly	Good		9230 70x37	Custom
70	70"x37"	custom	Monthly	Good		9230 70x37	Custom
68	66" long	custom	Monthly	Change	Switch to Ultra-Curb Guard Plus	9248 x 2	\$88.30 Custom
67	24" Round	9217	Monthly	Good	Add heavy metal sock (part# 9454)	9217	Standard
					Add heavy metal sock (part# 9454) underneath of		
65	24"x27"	9397	Monthly	Good	grate	9397	Standard
66	50"x45"	9356	Monthly	Good		9356	Standard
56	35"x35"	9356	Monthly	Good		9356	Standard
58	35"x35"	9356	Monthly	Good	Add heavy metal sock (part# 9454)	9356	Standard
57	24" Round	9356	Monthly	Change	Install heavy metal model	9397	\$257.14 Standard
97	24"x1'	Sock	Monthly	Good		9454	Standard
60	59" long	custom	Monthly	Change	Switch to Ultra-Curb Guard Plus	9248 x 2	\$88.30 Standard
61	117" long	custom	Monthly	Change	Switch to Ultra-Curb Guard Plus	9251 x 3	\$105.19 Standard
62	117" long	custom	Monthly	Change	Switch to Ultra-Curb Guard Plus	9251 x 3	\$105.19 Standard
62	51" long	custom	Monthly	Change	Switch to Ultra-Curb Guard Plus	9248 x 2	\$88.30 Standard
63	117" long	custom	Monthly	Change	Switch to Ultra-Curb Guard Plus	9251 x 3	\$105.19 Standard
63	51" long	custom	Monthly	Change	Switch to Ultra-Curb Guard Plus	9248 x 2	\$88.30 Standard
64	51" long	custom	Monthly	Change	Switch to Ultra-Curb Guard Plus	9248 x 2	\$88.30 Standard
40	233" long	custom	Monthly	Change	Switch to Ultra-Curb Guard Plus	9251 x 5	\$105.19 Standard
38	117" long	custom	Monthly	Change	Switch to Ultra-Curb Guard Plus	9251 x 3	\$105.19 Standard
39	117" long	custom	Monthly	Change	Switch to Ultra-Curb Guard Plus	9251 x 3	\$105.19 Standard
48	24"x24"	9217	Monthly	Good		9217	Standard
49	145"x12"	9255	Monthly	Good		9255 145x12	Custom
49	145"x12"	9255	Monthly	Good		9255 145x12	Custom
47	27"x27"	9217	Monthly	Change	Change to heavy metal version	9397	\$257.14 Standard
46	27"x27"	9217	Monthly	Change	Change to heavy metal version	9397	\$257.14 Standard
45	27"x27"	9217	Monthly	Change	Change to heavy metal version	9397	\$257.14 Standard
44	27"x27"	9217	Monthly	Change	Change to heavy metal version	9397	\$257.14 Standard
43	27"x27"	9217	Monthly	Change	Change to heavy metal version	9397	\$257.14 Standard
42	27"x27"	9217	Monthly	Change	Change to heavy metal version	9397	\$257.14 Standard
54	117" long	custom	Monthly	Change	Switch to Ultra-Curb Guard Plus	9251 x 3	\$105.19 Standard
53	52"x59"	9255	Monthly	Good		9255 60x70	Custom
51	65"x49"	9255	Monthly	Good		9397 84x60	Custom

52	24" Round	9217	Monthly	Good		9217	Standard
8	26" Round	9217	Monthly	Good	Add sediment sock (part# 9457)	9217	Standard
37	27"x27"	9217	Monthly	Good		9217	Standard
					Change to basin guard and add sediment sock (part# 9457)		
30	24" Round	9217	Monthly	Change?		92920S	\$120.50 Standard
3	27"x27"	9217	Monthly	Good		9217	Standard
2	27"x27"	9217	Monthly	Good	Install higher	9217	Standard
78	16"x16"	9217	Monthly	Good		9217	Standard
79	14"x14"	9217	Monthly	Good		9217	Standard
80	24" Round	9217	Monthly	Good		9217	Standard
81	10"x18"	9217	Monthly	Good		9217	Standard
50	29"x32"	9217	Monthly	Good		9217	Standard
82	19"x19"	9217	Monthly	Good		9217	Standard
83	19"x19"	9217	Monthly	Good		9217	Standard
6	24"x24"	9217	Monthly	Good	Add sediment sock (part# 9457)	9217	Standard
					Add 2 heavy metal socks (part# 9454) and small downspout guard		
9	???		Monthly	Add			Standard

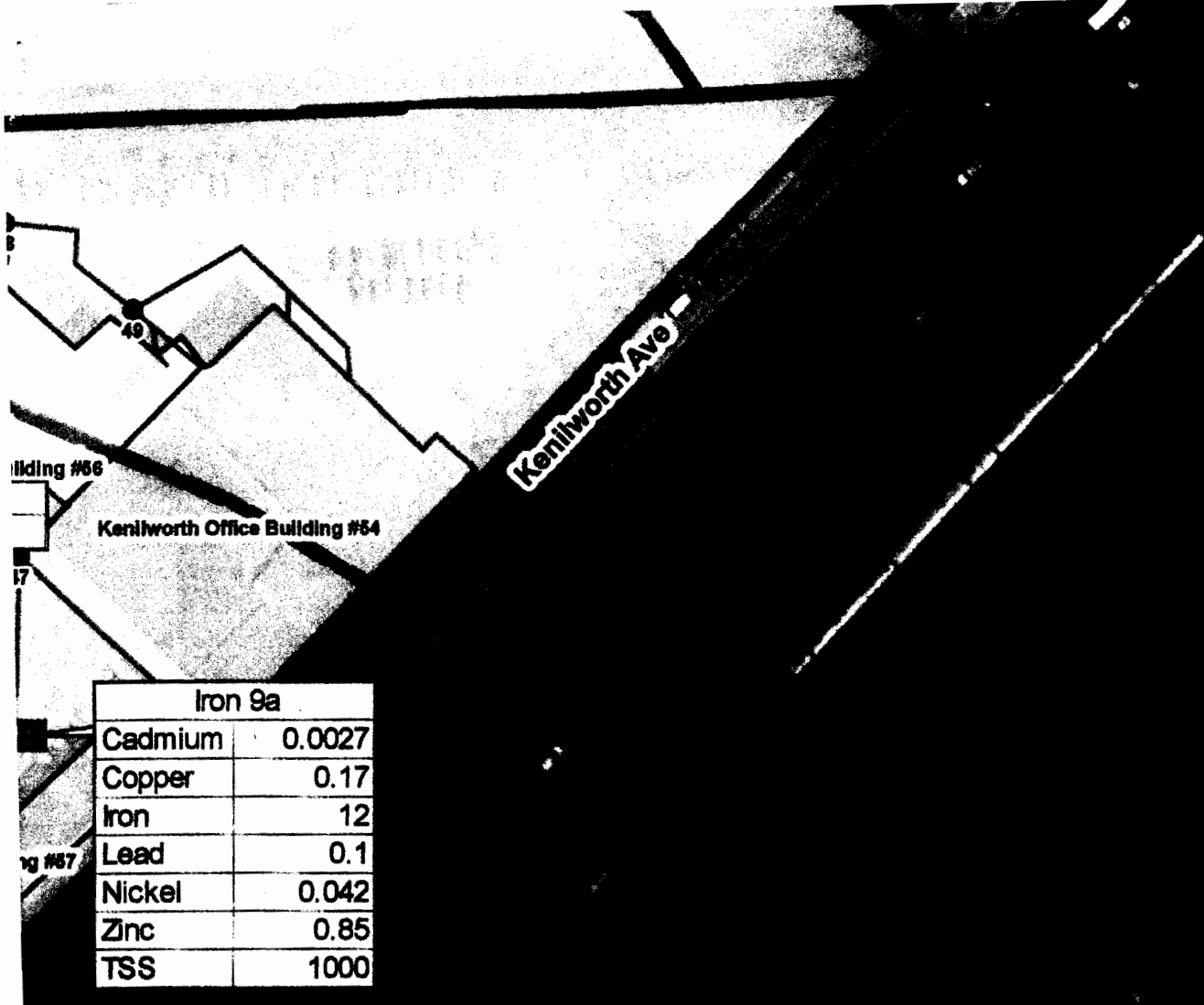
Plant Drains

85	20"x20"	9166	Monthly	Change	Switch to 9217	9217	\$46.15 Standard
21	20" Round	9217	Monthly	Good	Add heavy metal sock (part# 9454)	9217	Standard
					Try installing on top and add sediment sock (part# 9457)		
12	24" Round	9166	Monthly	Good		9166 24IN	Custom
11	24" Round	9166	Monthly	Good	Add sediment sock (part# 9457)	9166 24IN	Custom
					Add sediment sock (part# 9457), rocks and push back soil and rocks away from drain		
10	18" Round	9166	Monthly	Good		9166 18IN	Custom
22	13" Round	9166	Monthly	Good		9166 13IN	\$35.92 Custom
23	13" Round	9166	Monthly	Good		9166 13IN	\$35.92 Custom
20	22"x49"	9166	Monthly	Good		9166 22x49	Custom
					Build drain up; has a plastic grate that won't hold anything		
24	18"x25"	9166		N/A		9166 18x25	Custom
15	36"x40"	9166	Monthly	Good		9166 36x40	Custom
18	31"x31"	9166	Monthly	Change	Switch to 9217	9217	\$46.15 Standard
17	45"x45"	9166	Monthly	Good		9166 45x45	Custom
25	30" Round	92920S	Monthly	Good	Add sediment sock (part# 9457)	92920S	Standard
					Switch to 9356 and add 2 sediment socks (part# 9457)		
28	35"x35"	9166	Monthly	Change		9356	\$58.46 Standard
29	24" Round	9217	Monthly	Good	Add sediment sock (part# 9457)	9217	Standard
32	24" Round	9217	Monthly	Good		9217	Standard
31	24"x30"	9166	Monthly	Add	Add 9166; nothing in place	9166 24x30	\$40.81 Custom
26	24" Round	9217	Monthly	Good		9217	Standard
16	24" Round	9166	Monthly	Good		9166 24IN	Custom
35	44"x49"	9166	Monthly	Good	Add sediment sock (part# 9457)	9166 44x49	Custom
34	30"x34"	9217	Monthly	Good	Add sediment sock (part# 9457)	9217	Standard

33	24" Round		Monthly	Add	Add a couple of packs of microbes every couple of	5232	\$103.90/box of 24	Standard
19	31"x31"	9166	Monthly	Good	months	9166 31x31		Custom
1	24"x36"		Monthly	Add	Add heavy metal socks (part# 9454) around frame	9454		Standard
7	36"x63"	9166	Monthly	Change	Switch to 9356 with retention rods; Part# 9238	9356 48x70	\$68.70	Custom
4	24"x24"	9166	Monthly	Change	Switch to 9217	9217	\$46.15	Standard
5	24"x24"	9166	Monthly	Change	Switch to 9217 if you can get grate up	9217	\$46.15	Standard
13	42" Round	9166	Monthly	Change	Switch to 9356 with sediment sock (part# 9457)	9356	\$58.46	Standard
27	56'x1'		Monthly	Add	Add a heavy metal sock (part# 9454)	9454		Standard

Attachment 4

Large map



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PCB and Iron Source Tracking Pollutant Minimization Plan

Iron and PCB Sampling Locations and Results for Sampling Event One

Benning Generating Station Potomac Electric Power Company, Inc. Washington, DC

Prepared by - Date:
THP - 11/21/11

Checked by - Date:
LRP - 11/21/11

Project Number:
6123100052



Figure
Number:
B-1

Attachment 5

Range map

(Drains to outfall 401)

Outfall 005

25

Parking

PCB 9A

Congeners 1.39

Iron 9A

Cadmium	0.0018
Chromium	0.017
Copper	0.073
Iron	3.9
Lead	0.04
Nickel	0.013
Zinc	0.51
TSS	70

Kenilworth Ave

PCB and Iron Source Tracking Pollutant Minimization Plan

Iron and PCB Sampling Locations and Results for Sampling Event Two

Benning Generating Station Potomac Electric Power Company, Inc. Washington, DC

Prepared by - Date:
THP - 11/21/11

Checked by - Date:
LRP - 11/21/11

Project Number:
6123100052

amec

Figure
Number:
B-7

Attachment 6



John Huffman
Chief Operating Officer

February 28, 2007

By FedEx and Facsimile 610-666-4379

PJM Interconnection, L.L.C.
955 Jefferson Avenue
Valley Forge Corporate Center
Norristown, PA 19403-2497

Attention: Audrey Zibelman, Executive Vice President and
Chief Operating Officer

Re: Deactivation Notice for Buzzard Point Generating Station and Benning
Road Generating Station Pursuant to Section 113.1 of PJM Tariff

Ladies and Gentlemen:

This letter constitutes a notice of proposed Deactivation provided in accordance with Section 113.1 of the PJM FERC Electric Tariff (the "PJM Tariff"). Capitalized terms used herein but not otherwise defined have the meaning given them in the PJM Tariff.

1. Background.

Pepco Energy Services, Inc.'s subsidiary Potomac Power Resources, LLC ("PPR") owns the Buzzard Point Generating Station ("Buzzard Point Station"). Buzzard Point Station consists of two banks of oil-fired combustion turbines, the "Buzzard Point East Bank" and the "Buzzard Point West Bank" that are located in Washington, D.C. The Buzzard Point East Bank and the Buzzard Point West Bank each consists of 8 CTs, and each CT has a 16 MW name plate capacity rating. In total, the Buzzard Point Station consists of 16 CTs, with a total name plate capacity rating of 256 MW. Buzzard Point Station was installed in 1968.

In addition, PPR owns the Benning Road Generating Station ("Benning Road Station"), which consists of two oil-fired steam units, "Benning 15" and "Benning 16." Benning Road Station is located in Washington D.C. Benning 15 and Benning 16 each has a 275 MW name plate capacity rating, for a total capacity rating of 550 MW. Benning 15 was installed in 1968 and Benning 16 was installed in 1972.

2. Proposed Deactivation of Buzzard Point East Bank 3, 4 and 5 and West Bank 6.

PPR hereby provides notice to PJM Interconnection, L.L.C. ("PJM" or "Transmission Provider") that it desires to deactivate and retire three generating units in the Buzzard Point East Bank of Combustion Turbines ("CTs") and one generating unit within the Buzzard Point West Bank of CTs. The units to be deactivated and retired within the East Bank are unit nos. 3, 4 and 5, and the unit to be deactivated and retired within the West Bank is unit no. 6. East Bank unit no. 3 is currently unavailable for dispatch. East Bank unit nos. 4 and 5 and West Bank unit no. 6 have been removed from availability for dispatch by the Transmission Provider because their operation could result in further, significant degradation. East Bank unit nos. 3, 4 and 5 and West Bank unit no. 6 are sometimes collectively referred to herein as "E3-5/W6." Please note that East Bank unit no. 5 is also designated as a black start unit. The proposed Deactivation Date for E3-5/W6 is 90 days from the date of this letter.

3. Information related to Buzzard Point East Bank 3, 4 and 5 and West Bank 6.

Attached as Appendix A is a schedule for each of the E3-5/W6 CTs listing (a) a brief description of the repairs required to maintain the CTs, (b) a good faith estimate of the cost to maintain the CTs, and (c) a good faith estimate of the time period required to complete the work to maintain the CTs. The costs to maintain the E3-5/W6 CTs are necessarily highly dependent on permitting requirements. In addition, if returned to operation, continued operation would result in additional, incremental operation and maintenance expense.

4. Proposed Deactivation of the Balance of Buzzard Point Station and Benning Road Station.

PPR also hereby provides notice to the Transmission Provider that, based on the facts and circumstances known to it at this time, PPR intends to deactivate and retire each of the remaining Buzzard Point Station units and Benning 15 and Benning 16 upon the earlier of (a) the date each such unit suffers a failure or when conditions render it appropriate to declare the unit unavailable for dispatch (but subject to any appropriate actions needed with respect to reliability), and (b) May 31, 2012. PPR does not intend to repair the Buzzard Point Station CTs or Benning 15 or Benning 16 in the future where the costs of such repairs cannot be economically justified. Furthermore, PPR intends to deactivate the remaining units at Buzzard Point Station and Benning 15 and Benning 16 on May 31, 2012, to the extent any of them remain in operation until that date. It is not possible to describe any necessary repairs that may occur in the future, or to estimate the cost and time to undertake any repairs.

Therefore, PPR requests that PJM, in coordination with Pepco as transmission owner, complete at this time the analysis necessary to determine if the deactivation of each of the Buzzard Point Station units and Benning 15 and Benning 16 would have any adverse affect on the reliability of the Transmission System. PPR is prepared to work with PJM, Pepco and other stakeholders in accordance with the PJM Tariff and any applicable requirements should any of these facilities be determined necessary for reliability.

5. Conclusion.

PPR has maintained and will continue to maintain Benning Road Station and Buzzard Point Station in a safe and efficient manner and pursuant to PJM requirements and good utility practice. Nevertheless, the E3-5/W6 CTs are no longer available for dispatch. Furthermore, to the extent that the repair of the E3-5/W6 CTs and the other Buzzard Point Station units and Benning 15 and Benning 16 as they may fail cannot be justified at a reasonable cost consistent with law, regulation, good business practices, reliability, safety and expedition, and based on current facts and circumstances, deactivation is the remaining reasonable alternative.

We await notice from the Transmission Provider within thirty days of the date hereof pursuant to Section 113.2 of the PJM Tariff whether the Deactivation of (a) the E3-5/W6 CTs and (b) the other Buzzard Point Station units and Benning 15 and Benning 16 would adversely affect the reliability of the Transmission System.

Very truly yours,

POTOMAC POWER RESOURCES, LLC

By: _____

John U. Huffman, Chief Executive Officer

Cc: Agnes Yates, Chair, Public Service Commission of
the District of Columbia (202-393-1389)
Elizabeth Noel, People's Counsel for the District of Columbia (202) 727-1014
Joseph Bowring, PJM Interconnection, LLC
William Torgerson, Pepco Holdings, Inc.
Kirk Emge, Pepco Holdings, Inc.

APPENDIX A

Buzzard Point East CT # 3 - Retirement

- (a) Description of Required Repairs: Replacement of numerous components in kind, resulting from overheat of first stage buckets, failure of accessory gear, ground in generator.
- (b) Required Project Investment: Estimated \$4,200,000 based upon cost of identical, used replacement unit
- (c) Time Required to Repair, Not Including Permitting: 8 – 16 weeks; permitting and environmental requirements may increase the time required to repair and the scope and cost of repair.

Retirement of Buzzard Point East CT # 4 - Retirement

- (a) Description of Required Repairs: Remove covers, replace seals and 1st stage buckets, perform Hot Gas Path inspection; resulting from seal strip from first stage nozzle backed out and rubbed against first stage bucket.
- (b) Required Project Investment: Estimated \$500,000
- (c) Time Required to Repair, Not Including Permitting: 3 weeks; permitting and environmental requirements may increase the time required to repair and the scope and cost of repair.

Buzzard Point East CT # 5 (Black Start Unit) - Retirement

- (a) Description of Required Repairs: Replace bearing(s), replace compressor, repair generator rotor, replace 1st stage bucket, repair and coat 1st and 2nd stage nozzles; resulting from bearing failure which caused compressor rotor to impact compressor stator.
- (b) Required Project Investment: Estimated \$1,500,000
- (c) Time Required to Repair, Not Including Permitting: 6 weeks; permitting and environmental requirements may increase the time required to repair and the scope and cost of repair.

PJM Interconnection, LLC

February 28, 2007

Page 5 of 5

Buzzard Point West CT # 6 - Retirement

- (a) Description of Required Repairs: Replace bearings, perform major inspection; resulting from bearing failures.
- (b) Required Project Investment: Estimated \$750,000
- (c) Time Required to Repair, Not Including Permitting: 4 weeks; permitting and environmental requirements may increase the time required to repair and the scope and cost of repair.

Attachment 7



955 Jefferson Avenue
Valley Forge Corporate Center
Nonistown, PA 19403-2497

Michael J. Kormos
Senior Vice President
610.666.8943 / fax 610.666.4281
kormosmj@pjm.com

May 31, 2007

Mr. John U. Huffman
Chief Executive Officer
Potomac Power Resources, LLC
Senior Vice President
300 North 17th Street, Suite 1600
Arlington, VA 22209

Re: Proposed Deactivation of Buzzard Point and Benning Road Generating Stations

Dear Mr. Huffman,

This letter is regarding the February 28, 2007 deactivation notice from Potomac Power Resources, LLC (PPR) for the Buzzard Point and Benning Road Generating Stations. PJM understands the request is to deactivate four units (E3-5/W6) at Buzzard Point Generating Station (total capacity of 64 MW) by May 31, 2007, and to retire the remaining 12 units at Buzzard Point Generating Station (total capacity of 192 MW) and Benning Road Generating Station Units 15 and 16 (total 550 MW) by May 31, 2012.

Proposed Deactivation of Buzzard Point East Bank 3, 4, 5 and West Bank 6 (E3-5/W6)

PJM has determined the requested termination of operation of four Buzzard Point units effective May 31, 2007 would have no adverse impact on system reliability for 2007. However, PJM analysis has identified a number of reliability problems in Southwestern MAAC for the summer of 2008 which are aggravated by the proposed deactivations (see attachment). Based on the estimated in-service dates of the transmission system upgrades required to maintain reliability, Buzzard Point generating units E3-5/W6 are expected to be needed for reliability at least through the summer of 2008. PJM's analysis depends, in part, on input provided by the affected Transmission Owners. As such, our conclusions could change if further changes or refinements to this input are provided to PJM. Any changes to the transmission solutions or in the estimated system upgrade in-service dates will be communicated to you as soon as possible.

Proposed Deactivation of the Balance of Buzzard Point Station and Benning Road Station

PJM evaluated the retirement of the remaining twelve units at Buzzard Point generating station (total capacity of 192 MW) and units 15 and 16 at Benning Road generating station (total 550 MW) based on 2012 RTEP base case analysis. The attachment to this letter summarizes the specific reliability impacts resulting from the proposed deactivations, the transmission upgrades necessary to alleviate the reliability impacts, and the expected timing for completion of those upgrades. Based on the estimated in-service dates of the transmission system upgrades required to maintain reliability, the remaining twelve units at Buzzard Point generating station and Benning Road Units 15 and 16 are not expected to be needed for reliability after May 31, 2012. PJM's analysis depends, in part, on input provided by the affected Transmission Owners. As such, our conclusions could change if further changes or refinements to this input are provided to PJM. Any changes to the transmission solutions or in the estimated system upgrade in-service dates will be communicated to you as soon as possible.

In its letter dated February 28, 2007 PPR notified PJM that PPR intends to deactivate and retire each individual unit earlier than May 31, 2012 if "such unit suffers a failure or conditions render it appropriate to declare the unit unavailable for dispatch." PPR states that "It is not possible to describe any necessary repairs that may occur in the future, or to estimate the cost and time to undertake any repairs." Similarly, given the large number of transmission upgrades that are planned, PJM is unable to determine with certainty if an individual unit retirement prior to May 31, 2012 would not cause reliability issues. A request to accelerate the deactivation of an individual unit will need to be evaluated under the conditions at the time of the request.

Buzzard Point East Bank unit no. 1 (BECT1) and West Bank unit no. 1 and 5 (BWCT1 and BWCT5) are designated as critical Black Start Units pursuant to Schedule 6A in the PJM Open Access Transmission Tariff (OATT). Black start service at Buzzard Point began effective 12/1/2002 and is subject to a rolling two-year term of commitment, i.e., currently through 10/1/2008. Pursuant to Schedule 6A of the OATT, a one year notice is required for termination of the commitment. PJM and PEPCO have determined that there is insufficient black start capability in the PEPCO transmission zone to release the remaining Buzzard Point units from critical black start service. PJM will initiate the black start replacement process to attempt to find additional black start resources at the appropriate time before the generating units are deactivated.

Conclusion

PJM will continue to analyze alternative solutions to address the reliability issues identified, and will notify PPR if there are any changes which would allow the units to retire sooner than the dates currently identified.

Please note that PJM's determination does not supersede any outstanding contractual obligations between PPR and any other parties. Our conclusion regarding the above request is based on the following factors:

- (i) PJM's analysis of the projected reliability support requirements for its system,
- (ii) the availability of other units to meet these support requirements over the near term.

Please note that in accordance with the PJM Tariff Part VI, Subpart C, PPR will lose the Capacity Interconnection Rights associated with a deactivated generating unit in three years if a new Interconnection Request is not submitted within one year after the effective deactivation date. Also, if any of these generating units are receiving Schedule 2 payments for Reactive Supply and Voltage Control, the generating unit owner must inform PJM when the units are deactivated so that an adjustment in those payments can be made.

Please contact Ken Schuyler (610-666-8918) in the PJM Power System Coordination Department with your planned disposition of Buzzard Point E3-5/W6 generating units, or if you have any questions about the PJM analysis or the generation deactivation process.

Very truly yours,



Michael J. Kormos
Senior Vice President
Reliability Services

lamb
Attachment (1)

Copy to: Agnes Yates, Chair, Public Service Commission of the District of Columbia
Elizabeth Noel, People's Counsel for the District of Columbia
Audrey Zibelman, PJM Interconnection, LLC
Joseph Bowring, PJM Interconnection, LLC
William Torgerson, Pepco Holdings, Inc.
Kirk Emge, Pepco Holdings, Inc.
Peter Meier, Potomac Power Resources

ATTACHMENT

Buzzard Point Generating Station and Benning Road Generating Station Retirement Study

General

PJM received a deactivation notice from Potomac Power Resources, LLC (PPR) for the Buzzard Point and Benning Road generating stations. The request was to deactivate four units (E3-5/W6) with a total capacity of 64 MW at Buzzard Point generating station by May 31, 2007, and to retire the remaining 12 units at Buzzard Point generating station (total capacity of 192 MW) and units 15 and 16 at Benning Road generating station (total 550 MW) by May 31, 2012.

Buzzard Point East Bank 3, 4, 5 and West Bank 6 (E3-5/W6)

PJM has determined the requested termination of operation of four Buzzard Point units effective May 31, 2007 would have no adverse impact on system reliability for 2007. However, PJM analysis has identified two reliability problems for the summer of 2008 related to the SWMAAC Load Deliverability analysis. Based on the estimated in-service dates of the transmission system upgrades required to maintain reliability, the four Buzzard Point generating units (E3-5/W6) are expected to be needed for reliability through the summer of 2008.

The 2007 summer peak load system was studied to determine compliance with applicable PJM Reliability Criteria. For years 2008 and 2012, the Load Deliverability analysis results from the Reliability Pricing Model (RPM) study were used in determining compliance with PJM Reliability Criteria. The results are summarized below.

For 2007, retiring four Buzzard Point units effective May 31, 2007 would have no adverse impact on system reliability.

For 2008, no voltage drop or voltage limit violations are identified, but the following thermal constraints limit SWMAAC imports below CETO values:

- Brighton 500/230 kV transformer (103.9%) / loss of Brighton - W. Chapel 500 kV line
- Douds - Aqua Duct 230 kV line (121.6%) / loss of Douds - Station H 230 kV line (the other combination too)

These thermal constraints in 2008 are expected to be eliminated by the following transmission upgrades:

- At Brighton Substation - Install a second 1000 MVA 500/230 kV transformer and also two 500 kV breakers. The project is baseline upgrade number b0288. Estimated cost is \$33.1M and the in-service date is 6/1/2009.

- Reconnector both Doubs-Dickerson and Doubs-Aqueduct 230 kV circuits. The project is baseline upgrade number b0238. Estimated cost is \$9.6M and the in-service date is 6/112009.

Balance of Buzzard Point Station and Benning Road Station

Based on 2012 RTEP base case analysis assuming that Amos to Kemptown 765 kV circuit in-service, retiring the remaining twelve units at Buzzard Point generating station (total capacity of 192 MW) and units 15 and 16 at Benning Road generating station (total 550 MW) by May 31, 2012 will have an adverse impact on PEPCO sub transmission and distribution system reliability. Transmission and distribution upgrades have been identified that can eliminate the identified overloads. PJM's Transmission Planning Department has done thermal analysis with Benning and Buzzard units in service and also retired in 2012 with Amos to Kemptown 765 kV circuit in-service. In 2012, preliminary analysis indicates a few contingency overloads occur on the BGE/PEPCO transmission system and these can be fixed by 2012.

In addition, Pepco has done analysis assuming that Amos to Kemptown 765 kV circuit will not be in-service, and developed projects to eliminate all the identified local overloads by implementing the following transmission and distribution upgrades summarized below.

The 2012 system with retirement of Benning and Buzzard Point generation does not meet the BGE/Pepco load deliverability criteria. The first limiting thermal constraint is the Burches Hill – Palmers Comer 230kV circuits followed by Burches Hill 500/230kV transformer. The following thermal constraints were identified for the load deliverability test:

- Overload of approximately 15% on the Burches Hill 500/230kV transformer for the outage of the parallel transformer.
- Overload of approximately 10% on the Burches-Palmers Comer 230kV circuits for the outage of the parallel circuits.
- Overload of approximately 1% on Dickerson Station H-Quince Orchard 230kV circuit for the outage of the Brighton-Doubs 500kV circuit.
- Overload of approximately 9% on Quince Orchard-Bells Mill 230kV (028) circuits for the outage of the Quince Orchard-Bells Mill 230kV (029) circuits.
- Overload of Pleasant View 500/230kV transformer for the outage of the Doubs-Brighton 500kV circuit. (This Dominion facility was identified as overloaded in the 2012 Baseline case and Dominion is evaluating the needed enhancement)
- Voltage violations on Pepco's northern 230kV system, including Quince Orchard, Mt. Zion, Bells Mill Road and Burtonsville for the outage of Possum Pt.-Burches Hill 500kV circuit.

In addition, further analysis identified the following criteria violations in the Benning/Buzzard Point area for 2012:

- Normal overloads of 13% on the 230kV in feeds from Oak Grove to Ritchie to Benning and 17% on 69kV in feeds from the Takoma area into the Benning area.
- The normal case 69kV bus voltage at Benning, 0.956 pu, was less than the target voltage of 1.0 pu.
- Outage of either 230/69kV transformer at Benning resulted in contingency overloads of 5% to 9% on the remaining 230/69kV transformer and 40% to 51% on 69kV in-feeds from the Takoma area into the Benning area.
- Outage of one 69kV in-feed from the Takoma area resulted in an 83% overload on the remaining 69kV in-feed from the Takoma Area.
- Outage of one 230kV in-feed from Oak Grove resulted in a 50% overload on the remaining 230kV in-feed from Oak Grove.
- Outage of one 115kV in-feed from Bowie to the Benning Area resulted in an 11% overload on the remaining 115kV in feed.
- Outage on one 230/115kV transformer at Bowie resulted in a 9% overload on the remaining Bowie transformer.
- Outage on one 230kV in feed from Oak Grove combined with a stuck breaker at Benning resulted in 0% to 2% overload on the remaining 230/69kV transformer at Benning, 23% to 25% on the remaining 230kV in feed from Oak Grove and 46% to 61% on the 69kV in-feeds from Takoma.
- The Benning 69kV bus voltage remained marginal for all of the above outages.

In addition to the above thermal and voltage constraints, the analysis also indicated that for single contingency outages of Black Oak - Bedington 500kV circuit or Hatfield-Black Oak 500kV circuit, there are widespread voltage violations across Pepco, Dominion northern systems and Allegheny Power system.

Required System Additions and Enhancements Associated with Proposed Retirement of Benning & Buzzard Generation by 5/31/2012.

After consideration of various alternatives, Pepco identified a comprehensive solution to not only to address the 2012 situation but to provide a longer term solution to mitigate the impacts of generation retirements, to reliability violations expected by 2012 as a result of the Benning and Buzzard Point generation retirements. The following system addition/enhancements are required to resolve thermal overloads and voltage violations:

1. Add two new 230kV under ground circuits from Ritchie Substation 123 to Benning Sta. "A". (ISD 2012)
2. Add one 50 MVAR Shunt Reactor on the Benning 230kV bus. (ISD 2012)
3. Add one new 230/69kV, 250 MVA Transformer at Benning Sta "A". (ISD 2012)
4. Add two 50 MVAR 69kV Capacitor Banks at Benning. (ISD 2012)
5. Add a third Burches Hill 500/230kV transformer. (ISD 2012)
6. Upgrade three Burches Hill - Palmers Comer 230kV circuits (090,091,092). These circuits identified in 2012 Baseline for second contingencies. (ISD 2012)

7. Upgrade one Dickerson Station H-Quince Orchard 230kV circuit (032). (ISD 2012)
8. Upgrade terminal equipment on two Quince Orchard-Bells Mill 230kV circuits. (ISD 2012)
9. Add approximately 200 MVAR SVC at Dickerson Station H 230kV substation. (ISD 2012)
10. Add a 500kV circuit from Possum Point to Calvert Cliffs with terminations at Burches Hill and Chalk Point. (ISD 2012)

More analysis is required with more alternative transmission plans to determine when and what combination of these upgrades are required.

Attachment 8

GOVERNMENT OF THE DISTRICT OF COLUMBIA

District Department of the Environment



Air Quality Division

March 4, 2013

Ms. Pamela Maines, Vice President
Potomac Power Resources, LLC.
1300 North 17th Street, Suite 1600
Arlington, VA 22209

Mr. George P. Nelson
Potomac Electric Power Company
701 9th Street NW
Washington, DC 20068

Subjects: Termination of a Portion of Title V Operating Permit No. 026-R1 and Transfer of the Remaining Portions to Potomac Electric Power Company

Dear Ms. Maines and Mr. Nelson:

The Air Quality Division (AQD) of the District Department of the Environment (DDOE) is in receipt of Ms. Maines' letter dated August 13, 2012 concerning the termination of certain conditions in Chapter 3 (Title V) Permit No. 026-R1 issued to the Benning Road Generating Station on October 25, 2011. Additionally, we are in receipt of the your jointly issued letter dated December 17, 2012 on the same subject, with attached legal agreement between Potomac Power Resources LLC (PPR) and Potomac Electric Power Company (Pepco) dated December 19, 2012.

Based on this correspondence, DDOE understands that PPR has surrendered its permit to operate emission units A-15, A-16, auxiliary boilers A-Aux1 and A-Aux2, cool down emergency generator G-Diesel, and Miscellaneous/Insignificant Activities A-T2A, A-T3A, A-T1A, T-29, A-TWR15, and A-TWR16 at the Benning Road Generating Station. As of the date of this letter, no further operation of any of these units are permitted in the District of Columbia without first obtaining a new permit from AQD.

Additionally, in accordance with Lisa Pfeifer of Pepco Holdings, Inc.'s email of March 1, 2013 to me, both PPR is surrendering its permit to operate the Kenilworth Fuel Dispensing Facility, consisting of tank A-T35 and its associated fuel dispensing equipment as it was removed in 2012. Permission to operate the generator associated with this operation, generator GE002, has also been surrendered as it has been removed from the site.

We understand that the remaining units covered by Chapter 3 permit No. 026-R1, will continue to operate, but have been transferred to the responsibility of Pepco. Though not mentioned in the



Pamela Maines, Potomac Power Resources LLC and George P. Nelson, Potomac Electric Power Company
Benning Road Generating Station Title V Permit No. 026-R1 Partial Termination and Administrative Amendment
March 4, 2013
Page 2

December 19, 2012 agreement between PPR and Pepco, included in the transfer is the Benning fuel island 20,000 gallon underground biodiesel storage tank and the Kenilworth 15,000 gallon underground transformer oil storage tank. This was also clarified by email from Ms. Pfeifer to me on March 1, 2013.

As of the date of this letter, pursuant to 20 DCMR 303.8(d), the following conditions of Chapter 3 Permit No. 026-R1 are terminated (including all subsections of these conditions):

- III(a)(1)
- III(a)(2)
- III(a)(3)
- III(a)(4)
- III(a)(5)
- III(a)(6)
- III(b)(1)
- III(b)(2)
- III(b)(3)
- III(b)(4)
- III(b)(5) [Note that the August 13, 2012 letter requested cancellation of III(b)(5)(A-B), but due to a typographical error, the second condition in the is labeled "C" in the permit instead of "B". To be clear, all of Condition III(b)(5) is terminated.]
- III(b)(6)
- III(b)(7)
- III(b)(8)
- III(c)
- III(d)(1)
- III(d)
- IV(c)(1-4, and 7)
- VI(c)(1)(A-H)
- VI(d)
- VI(e) – Consent Decree: Visible Emissions Standards – Compliance by COMS
- VI(e) – Consent Decree: Visible Emission Standards – Additional Provision [Note that this condition should have been labeled Condition VI(f) as noted in the August 13, 2012 letter from Ms. Maines, but due to a typographical error was mis-labeled as a second Condition VI(d) in the permit]

However, also pursuant to 20 DCMR 303.8(d), PPR shall be responsible for submitting a final compliance certification through the date of this letter no later than September 1, 2013, pursuant to the requirements of Conditions I(d)(1), (2), (5), (9), and (10), for the aforementioned conditions.

**Pamela Maines, Potomac Power Resources LLC and George P. Nelson, Potomac Electric Power Company
Benning Road Generating Station Title V Permit No. 026-R1 Partial Termination and Administrative Amendment**

March 4, 2013

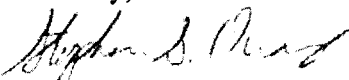
Page 3

By this letter, and as of the date of this letter, Chapter 3 Permit No. 026-R1 (except the terminated conditions noted above) is hereby administratively amended pursuant to 20 DCMR 303.4(a)(4) to recognize the change in ownership and operational control specified in the agreement dated December 19, 2012 and submitted to AQD. All references in the permit to Potomac Power Resources LLC as the "Permittee" are hereby revised to reflect that Potomac Electric Power Company (Pepco) is now the "Permittee". Additionally, the Responsible Official designated in the permit is hereby revised from Peter Meier of Potomac Power Resources LLC to George P. Nelson of Pepco, with the revised mailing address of 701 9th Street NW, Washington, DC 20068.

Please consider this letter to be an addendum to the permit that must be maintained with the original permit and any copy or copies maintained at the site pursuant to Condition I(b).

If you have any questions, please call me at (202) 535-1747 or John Nwoke at (202) 724-7778.

Sincerely,



Stephen S. Ours, P.E.
Chief, Permitting Branch

SSO

pc: Manuel J. Oliva
John C. Nwoke
Paul J. Wentworth, *EPA Region III [via email]*
Kathleen Cox, *EPA Region III [via email]*
Marcia Spink, *EPA Region III [via email]*

02232

Attachment 9



A PHI Company

P.O. Box 231
Wilmington, DE 19899-0231
302 429-3545

March 12, 2013

CERTIFIED MAIL # 70113500000135827788

Mr. Stephen Ours
Chief, Permitting Branch
Air Quality Division
District Department of the Environment
1200 First Street, NE – 5th Floor
Washington, D.C. 20002-3323

Re: Potomac Electric Power Company
Benning Service Center
Chapter 2 Non-Major Source Permit Application – Paint Spray Booth

Dear Mr. Ours:

Potomac Electric Power Company (Pepco) hereby submits the enclosed Chapter 2 Permit Application for a paint spray booth at the Pepco Benning Service Center located at 3400 Benning Road, N.E.. At the Benning Road site, Pepco operates the Benning Service Center and Pepco's affiliate, Potomac Power Resources LLC (PPR), formerly operated the Benning Generating Station. PPR permanently ceased operations of generating units A-15 and A-16 and auxiliary boilers A-Aux 1 and A-Aux-2 as of June 30, 2012. Emission units at Benning Road are currently subject to the requirements of a Chapter 3 Facility Permit (Permit # 026-R1). In a December 17, 2012 letter, Pepco and PPR jointly requested termination of the Chapter 3 Permit conditions applicable to the retired generating units and requested, that at the time DDOE terminated those Chapter 3 Permit conditions, that DDOE transfer the Chapter 3 Permit to Pepco. DDOE terminated the Chapter 3 Permit conditions applicable to the generating units in a letter dated March 4, 2013.

Pepco/PPR's December 17, 2012 letter also indicated Pepco's intent to file, during the first quarter of 2013, Chapter 2 Permit applications for minor emission sources at Benning Road that Pepco continues to operate. As follow-up to Pepco/PPR's December 17, 2012 letter and in accordance with directions from DDOE, Pepco is seeking to permit the minor emission sources at the Benning Service Center under the Chapter 2 operating permit program.

The minor emission sources at the Benning Service Center are:

- Seven diesel fueled emergency generators
- One propane fired emergency generator

Mr. Stephen Ours,
March 12, 2013
Page 2

- One diesel fire pump
- One spray paint booth

The enclosed Chapter 2 Permit application requests a permit for the spray paint booth which is identified as Source G21 in Chapter 3 Facility Permit (Permit # 026-R1). Pepco is submitting Chapter 2 Permit applications for the other minor emission sources under separate cover.

One fuel island remains at the site. This fuel island has two 20,000 gallon underground storage tanks (USTs), one containing gasoline and the other containing diesel fuel. The 20,000 gasoline UST is currently included in the Chapter 3 Permit as Source A-T2. In addition, a 15,000 gallon UST, known as the Kenilworth 15,000 gallon underground transformer oil storage tank, remains in operation. Pepco is informing DDOE about these USTs at DDOE's request based on Pepco's understanding that a Chapter 2 Permit application form applicable to these USTs is not available.

The enclosed map of the facility shows the location of the paint spray booth on the site.

If you need any additional information regarding these applications, please contact me at 302-429-3545 or lisa.pfeifer@pepcoholdings.com.

Very truly yours,



Lisa Pfeifer
Lead Environmental Scientist
Pepco Holdings, Inc.

Enclosures

Cc: P. Maines - PES
W. McNealy - Pepco
S. Harmon - Pepco



A PHI Company

P.O. Box 231
Wilmington, DE 19899-0231
302 429-3545

March 12, 2013

CERTIFIED MAIL # 70101870000271927758

Mr. Stephen Ours
Chief, Permitting Branch
Air Quality Division
District Department of the Environment
1200 First Street, NE – 5th Floor
Washington, D.C. 20002-3323

Re: Potomac Electric Power Company
Benning Service Center
Chapter 2 Non-Major Source Permit Applications- Emergency Generators

Dear Mr. Ours:

Potomac Electric Power Company (Pepco) hereby submits the enclosed Chapter 2 Permit Applications for emergency back-up generators and other minor sources at the Pepco Benning Service Center located at 3400 Benning Road, N.E. At the Benning Road site, Pepco operates the Benning Service Center and Pepco's affiliate, Potomac Power Resources, LLC (PPR), formerly operated the Benning Road Generating Station. PPR permanently ceased operations of generating units A-15 and A-16 and auxiliary boilers A-Aux 1 and A-Aux 2 as of June 30, 2012. Emission units at Benning Road are currently subject to the requirements of a Chapter 3 Facility Permit (Permit # 026-R1). In a December 17, 2012 letter Pepco and PPR jointly requested termination of the Chapter 3 Permit conditions applicable to the retired generating units and requested, that at the time DDOE terminated those Chapter 3 Permit conditions, that DDOE transfer the Chapter 3 Permit to Pepco. DDOE terminated the Chapter 3 Permit conditions applicable to the generating units in a letter dated March 4, 2013.

Pepco/PPR's December 17, 2012 letter also indicated Pepco's intent to file, during the first quarter of 2013, Chapter 2 Permit applications for minor emission sources at Benning Road that Pepco continues to operate. As follow-up to Pepco/PPR's December 17, 2012 letter, and in accordance with directions from DDOE, Pepco is seeking to permit the minor emission sources at the Benning Service Center under the Chapter 2 operating permit program.

The minor emission sources at the Benning Service Center are:

- seven diesel fueled emergency generators

Mr. Stephen Ours,
March 12, 2013
Page 2

- one propane fired emergency generator
- one spray paint booth
- one diesel fire pump.

The enclosed Chapter 2 Permit applications request permits for the following existing Chapter 3 permitted sources:

- GE0025
- GE0042
- GEA230
- GE0065
- GE0066
- GE0092
- GE001
- GE0100
- GENH220

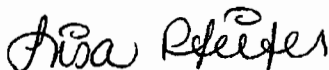
Pepco is submitting a Chapter 2 Permit application for the spray paint booth under separate cover.

One fuel island remains at the site. This fuel island has two 20,000 gallon underground storage tanks (USTs), one containing gasoline and the other containing diesel fuel. The 20,000 gasoline UST is currently permitted in the Chapter 3 Permit as Source A-T2. In addition, a 15,000 gallon UST, known as the Kenilworth 15,000 gallon underground transformer oil storage tank, remains in operation. Pepco is informing DDOE about these USTs at DDOE's request based on Pepco's understanding that a Chapter 2 Permit application form applicable to these USTs is not available.

The enclosed map of the facility shows the location of the minor sources at the site.

If you need any additional information regarding these applications, please contact me at 302-429-3545 or lisa.pfeifer@pepcoholdings.com.

Very truly yours,



Lisa Pfeifer
Lead Environmental Scientist
Pepco Holdings, Inc.

Mr. Stephen Ours,
March 12, 2013
Page 3

Enclosures

Cc: P. Maines - PES
W. McNealy - Pepco
S. Harmon - Pepco